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August 12, 2025

CONFIDENTIAL

Hon. J. Paul Oetken
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

RE: *ZL Technologies, Inc. v. KLDisccovery Ontrack, LLC, et al.*
1:25-cv-1:25-cv-02673-JPO (S.D.N.Y)

Your Honor:

We represent Plaintiff ZL Technologies, Inc. in this action.

All of the defendants in the action have filed motions to dismiss the Amended Complaint. Dkts. 56-68. Plaintiff's opposition briefs to these motions fall due on August 21, 2025. Given the volume and the difference in issues in particular presented by Shield Financial Compliance Ltd.'s motion to dismiss, Plaintiff requests an extension to its oppositions to at least Shield Financial Compliance Ltd. and Shield Financial Compliance, Inc. (collectively, the "Shield Defendants") from August 21, 2025 to September 2, 2025, with the Shield Defendants' replies to be filed no later than September 12, 2025. Counsel for the Shield Defendants has agreed to the requested extended schedule.

Plaintiff has not requested a previous adjournment or extension in the case. The date for Plaintiff's opposition to the remaining motions to dismiss will not be affected.

Respectfully submitted,



Kevin Murphy

cc: Counsel of record for Defendants